

**Gamma Acquisition L.L.C.
9601 S. Meridian Blvd.
Englewood, CO. 80112**

April 11, 2013

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St., SW
Room TW-A325
Washington, D.C. 20554

**Re: Annual 64.2009(e) 2013 CPNI Certification Covering Calendar Year 2012, EB
Docket No. 06-36**

Dear Ms. Dortch:

Gamma Acquisition L.L.C. ("Gamma") files this CPNI Certification pursuant to Section 64.2009(e) of the Commission's rules.¹ Gamma's predecessor-in-interest, TerreStar Networks Inc. ("TerreStar"), began providing commercial telecommunications service on September 21, 2010 as a wholesale provider of satellite roaming to AT&T Wireless.

1. Date filed: April 11, 2013
2. Name of company(s) covered by this certification: Gamma Acquisition L.L.C.
3. Form 499 Filer ID: 829423
4. Name of signatory: Ted Henderson
5. Title of signatory: Vice President, Corporate Development
6. Certification:

I, Ted Henderson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that Gamma complies with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

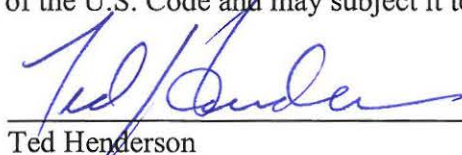
¹ 47 C.F.R. § 64.2009(e).

Gamma has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

Gamma has not received customer complaints in the past year concerning the unauthorized release of CPNI.

Gamma represents and warrants that the above certification is consistent with 47 C.F.R. §1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed:

A handwritten signature in blue ink, appearing to read "Ted Henderson", is written over a horizontal line.

Ted Henderson
Vice President, Corporate Development

Attachment: "Gamma Acquisition L.L.C. Statement Explaining CPNI Procedures Accompanying Its Annual 64.2009(e) CPNI Certification for Calendar Year 2012"

Gamma Acquisition L.L.C. Statement Explaining CPNI Procedures Accompanying Its Annual 64.2009(e) CPNI Certification for Calendar Year 2012

Commission rules require telecommunications carriers and interconnected VoIP providers to establish and maintain safeguards designed to ensure systems and business processes protect subscribers' CPNI.

Gamma is a wholesale provider of mobile satellite service to AT&T Wireless end users seeking satellite access as a roaming option outside of AT&T's wireless coverage area. The service is provided pursuant to a Mobile Satellite Services and Support Agreement ("MSSSA") entered between Gamma and AT&T Mobility II, LLC ("AT&T"). Pursuant to that agreement, Gamma supplies integrated cellular/mobile satellite terminals that are sold through authorized AT&T handset distributors to AT&T subscribers who order Satellite Augmented Mobility ("SAM") service.

Gamma does, indirectly, have end user customers, but only to the extent that the MSSSA allows as described herein. Pursuant to the MSSSA, Gamma is given a limited right to use AT&T end user data for the purposes of provisioning, providing, and monitoring the satellite roaming service; for usage and settlement of roaming charges; and for troubleshooting and customer care inquiries. All AT&T end user data remains the property of AT&T inasmuch as AT&T owns the customer and all associated CPNI. AT&T is responsible for substantially all aspects of the carrier-end user relationship, including billing, collection, settlement, adjustments, and dispute resolution. Gamma provides order fulfillment, second-level customer care, and network operation remediation services to AT&T end users who purchase SAM to extend coverage of their CMRS service.

Gamma has, by system and process design, limited access by employees and agents to individually identifiable CPNI of AT&T end users. Gamma Customer Care information, where gathered, is stored in remote SAS70 audited systems and is accessed through encrypted systems with multiple user identification protocols. End user interactions with Gamma Customer Care occur only after hand-off from AT&T. End user identity is verified by AT&T prior to the hand off. Where information provided to Gamma Customer Care is required by Network Operations to further investigate complaints, CPNI is stripped in favor of a mobile terminal, SIM, or MISDN identifier. With respect to settlement between AT&T and Gamma of MSS subscription and usage-based (roaming) charges, access to billing vendor records that could contain AT&T end user CPNI is restricted to employees using encrypted laptops and secure communications links to the vendor. Gamma performs a fulfillment function for mobile terminal orders placed through AT&T authorized distributors whereby terminals are shipped to the end user by Gamma upon receipt of an order from an AT&T distributor. In performance of the order fulfillment function, Gamma stores all order data on secure servers. All laptops that access or retrieve order data employ secure encryption. Any email transmission of fulfillment documents between Gamma and AT&T's distributor is encrypted. Individual access to order fulfillment records and systems is subject to identification protocols and physical access restrictions.

In considering 47 C.F.R. § 64.2009 compliance, Gamma states as follows with respect to its efforts to safeguard AT&T end user CPNI:

(1) All Gamma employees and contract personnel who have or may have access to customer information have received initial CPNI training. Protection of CPNI is considered a priority by senior management. Ongoing compliance is supervised by the officer who signed the certification accompanying this statement. Employees are informed that a breach of CPNI obligations will be reported to appropriate authorities in accordance with Gamma's legal obligations and that individuals responsible for a breach may be subject to disciplinary action up to and including termination.

(2) Gamma's predecessor-in-interest (TerreStar) fully vetted all internal organizations, systems, and business processes for CPNI compliance in 2010 before commencement of commercial service to ensure compliance with applicable law and contractual obligations, all of which continue to be in place. Gamma is also bound by the express terms of a Network Security Agreement ("NSA") between its predecessor-in-interest and the U.S. Departments of Justice and Homeland Security ("the Government Parties") dated December 18, 2009, to "... abide by all applicable FCC rules and regulations governing access to and storage of Customer Proprietary Network Information ("CPNI"), as defined in 47 U.S.C. § 222(h)(1)." Gamma is required by the NSA to report to the Government Parties within ten calendar days any incident where information acquired by Gamma or any of its officers, directors, employees, contractors, or agents reasonably indicates an occurrence of unauthorized access to or disclosure of, among other things, CPNI, in violation of federal, state or local law or regulation.

(3) Gamma's sensitivity to data security protocols also derives from its status as an authorized spacecraft licensee subject to the Arms Export Control Act and International Traffic in Arms Regulations. Gamma's facilities have premises security equipment and protocols in place to control access to facilities and systems that could contain CPNI.

(4) Design and implementation of regulatory safeguards was integrated with granular contractual obligations required by AT&T. Appendix I to the MSSSA, entitled "AT&T Supplier Information Security Requirements (SISR)," contains over 60 detailed internal process controls to protect AT&T end user data that Gamma may collect, store, convey, dispose of, or otherwise handle in connection with supplying satellite service to AT&T. Gamma is bound by the MSSSA to produce written documentation to evidence SISR compliance upon request by AT&T. As such, Gamma has adopted protocols, policies and methods of procedure to document compliance with each SISR.

(5) Gamma has no license or right to use AT&T customer identifiable CPNI. Gamma does not use AT&T CPNI to market or otherwise sell products except to the extent necessary for it to perform under the MSSSA.

(6) Gamma does not use CPNI to engage in outbound marketing programs.